

Version 7 Dated 04/03/2023 11:51AM

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

UNITED STATES OF AMERICA	§	
	§	
v.	§	No. 4:20-CR-212
	§	Judge Mazzant
DEBRA LYNN MERCER-ERWIN (1)	§	
KAYLEIGH MOFFETT (2)	§	
CARLOS ROCHA VILLAURRUTIA (5)	§	

EXHIBIT LIST

EXHIBIT NO.	SPONSOR	DESCRIPTION	O	O	E
			F	B	N
			F	J	T
1.		Server Physical Exhibit			
1A		Ledger			
1B		Search Warrant			
1C		Scanned Docs from Server			
1D		Server Extraction Report of Bank of America (9094) Records from WBAT			
1E		Sample Transactions by AGC			
2A	P4-GIS-139 Specialized	Mercer Email Attachment 9H-DTY-S6146 Escrow Agreement (EA)			
2B		Mercer Email Attachment 9H-LZM-S6073 EA			
2C		Mercer Email Attachment N253MY-S23974 EA			
2D		Mercer Email Attachment N351AA-S24032 EA			
2E		Mercer Email Attachment P4-GIS-S139 EA			
2F		Ledger Page 1A004 Lines 202-211			
2G		Ledger Page 1A005 Lines 258-265			
2H		Ledger Page 1A008 Lines 398-404			

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EXHIBIT NO.	SPONSOR	DESCRIPTION	O F	O F	E N T
3A	P4-GIS-139 WBIP	Mercer Email Attachment N784CK-S24783 EA			
3B		Mercer Email Attachment N784CK-S24783 First Amendment (FA) EA			
3C		Mercer Email Attachment N784CK-S24783 Executed (E) EA			
3D		Mercer Email Attachment N571UA-S27311 EA			
3E		Mercer Email Attachment N571UA-S27311 FAEA			
3F		Mercer Email Attachment N571UA-S2731 EEA			
3G		Mercer Email Attachment N572UA-S27312 EA			
3H		Mercer Email Attachment N572UA-S27312 FAEA			
3I		Mercer Email Attachment N572UA-S27312 EEA			
3J		Mercer Email Attachment P4-GIS-S139			
3K		Ledger Page 1A004 Lines 186-189			
3L		Ledger Page 1A004 Lines 215-216			
3M		Ledger Page 1A005 Lines 217-226			
3N		Ledger Page 1A007 Lines 366-369			
4A	B-16720-S41820	Mercer Email Attachment B-8211-S212 Letter of Intent (LOI)			
4B		ATT00001(3) – Mercer Email B-8211-S212			
4C		Mercer Email Attachment B-16720-S41820 Purchase Agreement (PA)			
4D		329950 Email and Attachments (Escrow & ATT0001) – Mercer Email B-16720-S41820			

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EXHIBIT NO.	SPONSOR	DESCRIPTION	O F F	O B J	E N T
4E		Mercer Email Attachment B-16720-S41820 Third Amended (TA) EA			
4F		Mercer Email Attachment B-16720-S41820 EA			
4G		329619 Email and Attachments (Escrow (1) & ATT00001(1) – Mercer Email B-16720-S41820			
4H		329607 Email and Attachments (Escrow & txt file) - Mercer Txt file B-16720-S41820			
4I		Ledger Page 1A014 Lines 736-754			
4J		Ledger Page 1A021 Lines 1127-1131			
5A	B-8108-S5129	322236 - Moffett Email P4-GIS-S139			
5B		Moffett Email B-8108-S5129 Refund Undertaking			
5C		Moffett Email B-8108-S5129 Letter			
5D		Mercer Email B-8108-S5129 LOI			
5E		317931 – Moffett Email P4-GIS-S139			
5F		Ledger Page 1A003 Lines 160-162			
5G		Ledger Page 1A004 Lines 163-168			
5H		Ledger Page 1A004 Lines 197-200			
6A	VT-SUG-S4387	Mercer Email VT-SUG-S4387 EA			
6B		Mercer Email VT-SUG-S4387 PA			
6C		329727 - Mercer Email VT-SUG-S4387			
6D		Mercer Email VT-ALF-S36305 PA			
6E		Mercer Email VT-ALG-S36306 EA			
6F		Ledger Page 1A019 Lines 1012-1020			

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EXHIBIT NO.	SPONSOR	DESCRIPTION	O F F	O B J	E N T
6G		Ledger Page 1A021 Lines 1087-1091			
6H		5/1/20 - Machado / Mercer WhatsApp			
6I		329629 – Email and Attachments (Escrow & ATT00001) Mercer Email VT-SUG-S4387			
7A	B-8197 – S 9473	329919 – Email and Attachments (Escrow & ATT00001(1)) Mercer Email B-8197-S9473			
7B		Escrow Agreement from Casey @ TBE			
7C		Mercer Email SU-GDN-S38288 / SU-GDP-S38290 EAs			
7D		Mercer Email 9M-FSL-S29062 EA			
7E		Mercer Email 9V-SWB-S33377 FA Promissory Note			
7F		329719 – Email & Attachments (Escrow & ATT00001)– Mercer Email SU-GDN-S38288 / SU-GDP-S38290			
7G		Ledger Page 1A015 Lines 776-788			
7H		Ledger Page 1A015 Lines 804-810			
7I		Ledger Page 1A020 Lines 1039-1055			
8A	VH-LQD-S4371	Mercer Email 9V-SWA-34568 Second Amendment to Promissory Note			
8B		Mercer Email 9V-SWB-S33377 Second Amendment to Promissory Note			
8C		Mercer Email ET-ALO-S33768 EA (CCUR)			
8D		Mercer Email ET-ALO-S33768 EA (JDS1)			
8E		Mercer Email ET-ALP-S33769 EA (CCUR)			
8F		Mercer Email ET-ALP-S33769 EA (JDS1)			

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EXHIBIT NO.	SPONSOR	DESCRIPTION	O	O	E
			F	B	N
			F	J	T
8G		329606 – Email and Attachments (Escrow & ATT00001) – Mercer Email ET-ALO-S33768			
8H		Mercer Email Trust Number 3020-3028-3252			
8I		Mercer Email VH-LQD-S4371 EA			
8J		Mercer Email VH-LQF-S4375 EA			
8K		Mercer Email VH-LQG-S4376 EA			
8L		358444 Email – Mercer Email VH-LQD-S4371 - VH-LQF-S4375 - VH-LQG-S4376			
8M		Mercer Email VQ-BNU-S29908 PA			
8N		Mercer Email VQ-BNU-S29908 EA			
8O		Mercer Email 9M-FSL-S29062 PA			
8P		Mercer Email 9M-FSL-S2906 EA			
8Q		Mercer Email B-2064-S29157 PA			
8R		Mercer Email B-2064-S29157 EA			
8S		Mercer Email EI-UUW-S30214 PA			
8T		Mercer Email EI-UUW-S30214 EA			
8U		Mercer Email VT-JES-S35159 Second Amendment (SA) EA			
8V		Mercer Email VT-JEU-S35160 SAEA			
8W		Ledger Page 1A018 Lines 970-972			
8X		Ledger Page 1A019 Lines 972-978			
8Y		Ledger Page 1A021 Lines 1081-1085			
8Z		Ledger Page 1A022 Lines 1154-1172			
9A	HL-8254-S40198	Mercer Email HL-8254-S40198 EA			

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EXHIBIT NO.	SPONSOR	DESCRIPTION	O F F	O B J	E N T
9B		Mercer Email HL-8254-S40198 Amended Letter Agreement			
9C		Ledger Page 1A021 Lines 1102-1125			
10A	HL-8284-S40199	Mercer Email HL-8284-S40199 EA			
10B		Mercer Email Pk-GIA-S40074 EA			
10C		Mercer Email PK-GIK-S40073 EA			
10D		8/5/20 – Machado /Mercer SMS			
10E		8/5/20 – 8/7/20 Mercer/Chemtov SMS			
10F		8/5//20 - Machado/Chemtov WA			
10G		Ledger Page 1A021 Line 1134			
10H		Ledger Page 1A022 Lines 1136-1152			
11A		Moffett Email S4424 Letter			
11B		Moffett Email S4424 EA			
11C		Ledger Page 1A007 Lines 360-364			
12		Bank of America Records – 9094 American Guaranty Company - 2015			
13		Bank of America Records – 9094 American Guaranty Company - 2016			
14		Bank of America Records – 9094 American Guaranty Company - 2017			
15		Bank of America Records – 9094 American Guaranty Company – 2018			
16		Bank of America Records – 9094 American Guaranty Company - 2019			

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EXHIBIT NO.	SPONSOR	DESCRIPTION	O	O	E
			F	B	N
			F	J	T
17		Bank of America Records – 9094 American Guaranty Company - 2020			
18		DLE Escrow – Bank of America - 1222			
19		CrossFirst (Wright Brother's Bank Account – 6592)			
20		Navy Federal Credit Union – Kayleigh Moffett			
21		Bank of America – Gustava Ramirez - 2425			
22A		Cell Phone of Debra Mercer-Erwin – 405-501-0562			
22B		Cell Phone Image of Debra Mercer-Erwin – 405-501-0562			
23A		Cell Phone Dump of Apple iPhone 11 of Federico Machado – 754-581-2809			
23B		Extraction Report of Cell Phone Dump of Apple iPhone 11 of Federico Machado – 754-581-2809			
24		Image of Apple Computer of Federico Machado			
25		Grace Power Point			
26A		Census – Existence – Mercer			
26B		Census – Nonexistence – Villaurrutia			
27		Casey Sullivan Diagram			
28		Pre-signed Bill of Sale			
29		Spreadsheet of Duplicate planes			
30		Video Google Search			
31		Video How to file an EEI			
32		NBAA Guide on export			

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EXHIBIT NO.	SPONSOR	DESCRIPTION	O	O	E
			F	B	N
			F	J	T
33		OFAC License determination			
34		Aircraft Working Group (AWG) List of names			
35A		Debra Mercer-Erwin Interview			
35B		Transcript of Debra Mercer-Erwin Interview			
36A		Kayleigh Moffett Interview			
36B		Transcript of Kayleigh Moffett Interview			
37A		Call between Machado - Mercer			
37B		Transcript of Call between Machado - Mercer			
38A		Federico Machado Phone Interview			
38B		Transcript of Federico Machado Phone Interview			
39		FAA Clarification Memo 2013			
40		Photo of El Chapo			
41		Semi-submersible sub video			
42		Photos of Defendants Debra Mercer-Erwin, Kayleigh Moffett and Carlos Villaurrutia			
43		AGC Website			
44		Email BIS Outreach to AGC – 21 March 2019			
45		AGC Response to BIS Subpoena			
46		FAA Aircraft Registration and Recordation Process (pg 59)			
47		Debra Mercer EEI Filings			
48		Residential Photos of Debra Mercer and Kayleigh Moffett			
49		Photo of Guillermo Garcia Mendez			

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EXHIBIT NO.	SPONSOR	DESCRIPTION	O	O	E
			F	B	N
			F	J	T
N8286M					
50A		Blue Ribbon			
50B		Photo of Plane			
50C		Abandonment Form			
50D		Power Aircraft Invoice (Longbeach)			
50E		Photos of seizure of plane			
N456PF					
51A		Blue Ribbon			
51B		Photo of Plane			
51C		Abandonment Form			
51D		Photos of seizure of Plane			
N260RC					
52A		Blue Ribbon Registration			
52B		Photo of plane			
52C		AMOC			
52D		Texas Aircraft Exemption Certificate			
52E		Possible addition of Email from A. Deringer, Inc. to Paul Macke – ask Ernest/Paul			
N18BA/N299GS					
53A		Blue Ribbon for N18BA			
53B		Blue Ribbon for N299GS			

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EXHIBIT NO.	SPONSOR	DESCRIPTION	O	O	E
			F	B	N
			F	J	T
53c		Photos of Plane N18BA/N299GS			
53D		AMOC			
53E		Photos of crash site			
N305AG					
54A		Blue Ribbon			
54B		Photos of Plane			
54C		AMOC			
54D		Photos of plane at landing strip			
54E		Video of Plane taking off			
54F		Chain of Custody			
54G		Drugs			
54H		Lab Report			
54I		Fountain Head Report – check for latest version			
54J		Jessie Villareal PowerPoint			
N311BD					
55A		Blue Ribbon			
55B		Photo of Plane			
55C		AMOC			
55D		Aerotitle Escrow N311BD Subpoena			
55E		Intentionally Left Blank			
55F		Lab Report – Belize 02-11-2021 – 10k			
55G		Physical Drugs			

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EXHIBIT NO.	SPONSOR	DESCRIPTION	O	O	E
			F	B	N
			F	J	T
55H		Immigration Information			
55I		Fountain Head Report			
55J		Photo of Heriberto Calderon Gastelum			
55K		Intentionally Left Blank			
55L		Intentionally Left Blank			
55M		Photo of Drugs in plane			
55N		Intentionally Left Blank			
55O		Jessie Villareal PowerPoint			
		N569LM			
56A		Blue Ribbon			
56B		Photo of plane – BIS seizure from Brownsville			
56C		AMOC			
56D		Photo of seizure of Plane			
56E		Jessie Villareal PowerPoint			
		N515BA			
57A		Blue Ribbon			
57B		Photo of Plane			
57C		AMOC			
57D		Photos of crash site			
57E		Jessie Villareal PowerPoint			
		N770SW			
58A		Blue Ribbon			

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EXHIBIT NO.	SPONSOR	DESCRIPTION	O	O	E
			F	B	N
			F	J	T
58B		Photo of Plane			
58C		AMOC			
58D		Photo of Federico Machado			
58E		Federico Machado Phone Interview			
58F		Transcript of Federico Machado Phone Interview			
N224EA					
59A		Blue Ribbon			
59B		Photo of Plane			
59C		AMOC			
59D		Video of crash site			
59E		Photo of crash site			
59F		Excerpt from Financial Records of Villaurrutia analyzed by IRS Sonia Hurtado			
59G		Jessie Villareal PowerPoint			
N241CW					
60A		Blue Ribbon			
60B		Photo of Plane			
60C		AMOC			
60D		Jessie Villareal PowerPoint			
N322BC					
61A		Blue Ribbon			
61B		Photo of Plane			
61C		AMOC			

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EXHIBIT NO.	SPONSOR	DESCRIPTION	O	O	E
			F	B	N
			F	J	T
61D		Photo of seizure of Plane			
61E		Photo of Plane dated Oct 21, 2019			
61F		Jessie Villareal PowerPoint			
N35531/N454SC					
62A		Blue Ribbon			
62B		Photo of Plane			
62C		AMOC			
62D		Photos of seizure of Plane			
62E		Email to Jessie Villareal from Storm Flying Services 6/10/2019			
62F		Jessie Villareal PowerPoint			
N465BC					
63A		Blue Ribbon			
63B		Photo of Plane			
63C		AMOC			
63D		Photos of seizure of Plane			
63E		Excerpts of Villaurrutia Financial Records analyzed from IRS Sonia Hurtado			
63F		Jessie Villareal PowerPoint			
N530GA					
64A		Blue Ribbon			
64B		Photos of Plane			
64C		AMOC			

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EXHIBIT NO.	SPONSOR	DESCRIPTION	O	O	E
			F	B	N
			F	J	T
64D		Photos of crash site			
64E		Jessie Villareal PowerPoint			
N939RR					
65A		Blue Ribbon			
65B		Photo of Plane			
65C		AMOC			
65D		Photos of Drugs			
65E		Mexico Registration 05/04/2020			
65F		Chain of Custody from Guatemala			
65G		Lab Results Cocaine 11.45k			
65H		Physical Evidence – Cocaine 11.45k			
65I		Excerpts of Villaarrutia Financial Records analyzed from IRS Sonia Hurtado			
65J		Jessie Villareal PowerPoint			
N990PA					
66A		Blue Ribbon			
66B		Photos of Plane			
66C		AMOC			
66D		Photo of Plane crash site			
66E		Excerpts of Villaarrutia Financial Records analyzed by IRS Sonia Hurtado			
66F		Jessie Villareal PowerPoint			
N368AG					

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EXHIBIT NO.	SPONSOR	DESCRIPTION	O	O	E
			F	B	N
			F	J	T
67A		Blue Ribbon			
67B		Photos of Plane			
67C		AMOC			
67D		Photos of Crash Site			
67E		Excerpts of Villaurretia Financial Records analyzed by IRS Sonia Hurtado – check with Jessie			
67F		Jessie Villareal PowerPoint			
N2000					
68A		Blue Ribbon			
68B		Photos of Plane			
68C		AMOC			
68D		Excerpts of Villaurretia Financial Records analyzed by IRS Sonia Hurtado – Check with Jessie			
68E		Jessie Villareal PowerPoint			
N466MM/NN886N					
69A		Blue Ribbon			
69B		Photos of Plane			
69C		AMOC			
69D		Photo of plane and drugs			
Intentionally Left Blank					
N884AB					

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EXHIBIT NO.	SPONSOR	DESCRIPTION	O	O	E
			F	B	N
			F	J	T
71A		Blue Ribbon			
71B		Photo of Plane			
71C		AMOC			
71D		Jessie Villareal PowerPoint			
N740HB					
72A		Blue Ribbon			
72B		Photo of Plane			
72C		AMOC			
72D		Photo of unknown person loading Covid masks			
N777EH					
73A		Blue Ribbon			
73B		Photo of Plane			
73C		AMOC			
73D		Photos of Drug Seizure of Plane			
73E		Article of Death of Michael Milligan – in Spanish			
73F		Chain of Custody for Bulk Cocaine			
73G		Chain of Custody of Samples			
73H		Drugs			
73I		Lab Report			
73J		Fountain Head			
73K		Jessie Villareal PowerPoint			
74		Villarutia Wells Fargo			

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EXHIBIT NO.	SPONSOR	DESCRIPTION	O F	O F	E N
75		Villarutia Bank of America			
76		Business Documents – TWA			
77		Business Documents – Ford Electric			
78		Business Documents – Texton Enterprises			
79		Business Documents – AllVica			
80		Business Documents – Machado			
81		Business Documents – Marcos			
82		Business Documents Harvard Business Services			
83		Business Documents Aviation Escrow/Title			
84		Business Documents BMI Associates			
85		Business Documents Delta Title			
86		Business Documents Lincoln Investment and ???			
87		Business Documents Global Business Jets, LLC			
88		Business Documents Global Television Network			
89		Business Documents Innercharge Inc.			
90		Business Documents Intercontinental Partners			
91		Business Documents Paradise Garden			
92					
93		Summary Chart of Terms			
94		Summary Chart of Individuals			
95		Summary Chart of FAA Regulations			
96A		Photo of Plane N190JH			

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			F	B	N
			F	J	T
96B		N190JH Notice of Abandonment			
96C		Video of "We have trust issues"			
97		Paul Macke PowerPoint			
98A		Photos from seizure at 6007 Lytham Drive, Dallas, Texas			
98B		Drugs seized from 6007 Lytham Drive, Dallas, Texas			
98D		Lab reports for seizure at 6007 Lytham Drive, Dallas, Texas			
98D		Miscellaneous documents seized from 6007 Lytham Drive, Dallas, Texas			
99A		Photos from seizure at port of entry			
99B		Drugs seized from port of entry			
99C		Lab report from port of entry seizure			
99D		Miscellaneous documents from port of entry seizure			

Respectfully submitted,

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United States Attorney

/s/
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Ernest.Gonzalez@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed via electronic filing to defense counsel on April 3, 2023.

 /s/
ERNEST GONZALEZ